

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Sarah Saroja Kolla, Debtor) Case No. 17-32440-KRH
) Chapter 13

MOTION TO REOPEN CASE

COMES NOW Suzanne E. Wade, Chapter 13 Trustee, and pursuant to 11 U.S.C. §350(b), Local Rule 5010-1 moves the Court to reopen the above-captioned Chapter 13 case; and in support thereof, states as follows:

1. The Trustee seeks to reopen this case for the purpose of filing an adversary proceeding to revoke the Debtor's discharge because of her failure to adequately disclose assets.
2. This Debtor received a discharge on October 8, 2020 and the case was closed on February 10, 2021.
3. The Trustee has recently learned the Debtor may have had additional assets that were not adequately disclosed in the Debtor's schedules.
4. The Trustee is working with Debtor's counsel in an attempt to clarify what, if any, additional assets were owned by the Debtor at the filing of the case or acquired by the Debtor while the case was pending.
5. This case should be reopened so the Trustee may file an adversary proceeding to determine if the Debtor's discharge should be revoked because she obtained it by failing to fully and properly disclose all her assets to the Court.
6. The Trustee requests that the court costs associated with this motion be waived.

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee respectfully moves the Court to reopen this Chapter 13 case, and to waive payment of the cost of this motion and for such further and other relief as the Court deems necessary.

Date: October 8, 2021

/s/ Suzanne E. Wade
Suzanne E. Wade, Chapter 13 Trustee

Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 31868
7202 Glen Forest Drive, Suite 202
Richmond, Virginia 23226
(804) 775-0979

CERTIFICATE OF SERVICE

I hereby certify a true copy of the foregoing MOTION TO REOPEN CASE was served electronically or by first-class mail, postage prepaid, this 8th day of October, 2021, upon the following parties:

Sarah Saroja Kolla
5871 Chipwood Court
Elkridge, MD 21075

Callyn Marianna Gibson, Counsel for Debtor
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Richmond, VA 23230-1588
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BWW Law Group, LLC
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Malvern PA 19355-0701

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Wilmington, DE 19884-2211

Bank of America, N.A.
P O Box 982284
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Valhalla, NY 10595

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Wilmington, DE 19850-0000

Chase/Bank One Card Services
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Wilmington, DE 19850-0000

CitiCards CBNA
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Discover Products Inc
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Discover Financial Services
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Carol Stream, IL 60197-6103

Ditech
Attn: Customer Care
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Waterloo, IA 50704-0205

Ditech Financial LLC fka Green Tree Servicing
LLC
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Rapid City, South Dakota 57709-6154

Fairfax AMB Surgery Center
10730 Main Street
Fairfax, VA 22030-0000

Fairfax MRI Center
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Suite 100
Fairfax, VA 22031-0000

Fairfax Radiological Consult.
PO BOX 3650
Merrifield, VA 22116-0000

Inova Breast Care Center
8318 Arlington Boulevard
Suite 30
Fairfax, VA 22031-0000

Inova Health System
Inova Fairfax Hospital
3300 Gallows Road
Falls Church, VA 22042-0000

Neurology Center of Fairfax
3020 Haymaker Court
Suite 400
Fairfax, VA 22031-0000

Suzanne E. Wade, Chapter 13 Trustee
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NewRez LLC d/b/a Shellpoint Mortgage Servicing
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Greenville, SC 29603-0826

Office of the US Trustee
701 E. Broad Street
Room 4304
Richmond, VA 23219-0000

REMEX, Inc
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Rocky Hill, NJ 08553-0457

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by American InfoSource LP as agent
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Oklahoma City, OK 73118

Verizon
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Saint Charles, MO 63304-2225

Zwicker & Associates
948 Clopper Rd, 2nd Floor
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/s/ Suzanne E. Wade
Suzanne E. Wade, Chapter 13 Trustee

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7202 Glen Forest Drive, Suite 202
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Sarah Saroja Kolla, Debtor)	Case No. 17-32440-KRH
)	Chapter 13
)	
5871 Chipwood Court)	
Elkridge, MD 21075)	
)	
XXX-XX – 5314)	
)	

NOTICE OF MOTION TO REOPEN CASE AND NOTICE OF HEARING

Suzanne E. Wade, Chapter 13 Trustee, has filed papers with the Court to request an Order be entered to Reopen Case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one, in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before seven (7) days before the date of the hearing, you or your attorney must:

X File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H)(3). If you mail your response to the Court for filing, you must mail it early enough that the Court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

You must also mail a copy to:

Suzanne E. Wade, Chapter 13 Trustee
7202 Glen Forest Drive, Suite 202
Richmond, Virginia 23226

X Attend the hearing on the Motion, scheduled to be held **REMOTELY** on **November 3, 2021** at **11:30 a.m.**

Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 31868
7202 Glen Forest Drive, Suite 202
Richmond, Virginia 23226
(804) 775-0979

REMOTE HEARING INFORMATION:

Due to the COVID-19 public health emergency, no in-person hearings are being held. This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the "Zoom Request Form"), which is available on the Court's internet website at www.vaeb.courts.gov, on the page titled, "Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information." Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge's attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion, and may enter an order granting that relief.

Date: October 8, 2021

/s/ Suzanne E. Wade
Suzanne E. Wade, Chapter 13 Trustee

CERTIFICATE OF SERVICE

I hereby certify a true copy of the foregoing NOTICE OF MOTION TO REOPEN CASE AND NOTICE OF HEARING was served electronically or by first-class mail, postage prepaid, this 8th day of October, 2021, upon the following parties:

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5871 Chipwood Court
Elkridge, MD 21075

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3300 Gallows Road
Falls Church, VA 22042-0000

Neurology Center of Fairfax
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Suite 400
Fairfax, VA 22031-0000

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